

**P O R T E R | S C O T T**

A PROFESSIONAL CORPORATION

John R. Whitefleet, SBN 213301

[jwhitefleet@porterscott.com](mailto:jwhitefleet@porterscott.com)

Colin J. Nystrom, SBN 354503

[cnystrom@porterscott.com](mailto:cnystrom@porterscott.com)

2180 Harvard Street, Suite 500

Sacramento, California 95815

TEL: 916.929.1481

FAX: 916.927.3706

Attorneys for Defendants

STANISLAUS COUNTY, JUSTIN CAMARA, ZA XIONG, ERIC BAVARO

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

DOROTHEY HEIMBACH, individually  
and as successor in interest to Anthony  
Silva,

Plaintiff,

v.

STANISLAUS COUNTY; and  
JUSTIN CAMARA, ZA XIONG,  
and ERIC BAVARO, in their  
individual capacities,

Defendants.

Case No. 2:23-cv-01887-DJC-CSK

**JOINT MID-DISCOVERY STATEMENT**

Judge: Hon. Daniel J. Calabretta

Magistrate Judge: Chi Soo Kim

Pursuant to F.R.C.P. Rule 26(f) and Local Rule 240(b), and the Court's Order dated February 1, 2024, counsel for the Plaintiff Dorothey Heimbach ("Plaintiff"); Defendants Stanislaus County ("County"), Justin Camara, Za Xiong, and Eric Bavaro (collectively, "County Defendants") hereby jointly submit the following Joint Mid-Discovery Statement.

**(a) Discovery**

Parties have been engaged in and continue to conduct meaningful discovery. Discovery thus far has included both written discovery requests and depositions. The parties intend to engage in further written discovery and to depose additional material witnesses, including but not limited to Plaintiff Dorothey Heimbach, Stanislaus Deputies Romero, Babbit, and Hickman, and any other witnesses to the subject incident.

The parties are actively meeting and conferring in an effort to resolve pending discovery disputes without requiring court intervention. Parties will continue to meet and confer in good faith should any additional discovery issues arise during the discovery phase of this case prior to involving the Court.

The parties do not anticipate any issues that prevent discovery from proceeding in accordance with the scheduling order currently in effect.

Dated: September 5, 2024

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By /s/ John R. Whitefleet  
John R. Whitefleet  
Colin J. Nystrom  
Attorneys for Defendants

DATED: September 5, 2024

LAW OFFICES OF DALE K. GALIPO

By: /s/ Cooper Alison-Mayne (auth'd on 9-5-24)  
Dale K. Galipo  
Cooper Alison-Mayne  
Attorneys for Plaintiff